

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AAA MAX LIMITED, AAA MAX 2 LIMITED,  
AAA MAX 3 LIMITED, AAA MAX 4  
LIMITED, AAA B787 2 LIMITED and AAA  
B787 3 LIMITED,

Plaintiffs,

v.

THE BOEING COMPANY,  
Defendant.

No. 2:23-cv-01356-RSM

UNOPPOSED MOTION AND ORDER  
FOR LEAVE TO FILE PLAINTIFFS'  
REDACTED AMENDED COMPLAINT

Noting Date: March 8, 2024

Defendant The Boeing Company (“Boeing”) respectfully moves the Court to grant Plaintiffs AAA Max Limited, AAA Max 2 Limited, AAA Max 3 Limited, AAA Max 4 Limited, AAA B787 2 Limited, and AAA B787 3 Limited (the “Plaintiffs” or “AAA Entities”) leave to file a redacted version of their Amended Complaint and maintain the unredacted copy under seal. The proposed redactions seal only about 30 lines out of a 110-page pleading and are necessary to protect Boeing’s confidential business information. The proposed redacted complaint for filing is attached as Exhibit A. Plaintiffs do not oppose the redactions in Exhibit A.

UNOPPOSED MOTION AND ORDER FOR  
LEAVE TO FILE AAA’s REDACTED  
AMENDED COMPLAINT  
Case No. 23-cv-01356-RSM

## PROCEDURAL HISTORY

Boeing follows up on the Parties' prior request to seal the recently filed Amended Complaint, which the Court granted on March 1, 2024. *See* ECF No. 63. The Parties conferred again between March 7 and 8, 2024, and counsel for Plaintiffs represented that Plaintiffs would not oppose Boeing's proposed redactions of minimal portions of the Amended Complaint, which is the least restrictive means of protecting Boeing's contractual information contained in the pleading.

## LEGAL STANDARD AND ARGUMENT

This unopposed motion adopts and incorporates by references the parties' Stipulated Motion and Order for Leave to File the AAA Entities' Amended Complaint Under Seal at ECF No. 61. For the reasons set out in the Stipulated Motion, the particular contractual terms of the Purchase Agreements and AGTAs excerpted or summarized in the AAA Entities' Amended Complaint—specifically at paragraphs 80, 169-73, 183, 189, 195, 197, 199, 234, 253, 267-69, 271—should be redacted in the public filing. The specific sections to be redacted either disclose (1) the price of the aircraft negotiated between Boeing and an airline customer, (2) terms of confidential contracts, or (3) communications about the confidential negotiations surrounding the purchase of aircraft. It is Boeing's position that such information is maintained as highly confidential in its normal course of business, and the disclosure of such information would damage Boeing's ability to negotiate with other customers. *See* ECF No. 61. Plaintiffs do not oppose this request to seal this information.

Redacting portions of 17 out of the Amended Complaint's 345 total paragraphs (or less than 5% of the Amended Complaint) is the least restrictive method available to ensure protection of Boeing's confidential and sensitive information. *See* LCR 5(g)(3)(B)(iii) (requiring the least restrictive method to ensure protection of material to be sealed). Because there are no less restrictive alternatives available, the parties agree that redaction is appropriate.

## CONCLUSION

For the foregoing reasons, Boeing respectfully requests that this Court grant the AAA Entities' leave to file a redacted Amended Complaint, attached as Exhibit A, leaving sealed only

1 small portions of 17 paragraphs that disclose the contents of Boeing's proprietary business contracts.

2  
3 DATED: March 8, 2024

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24 *Company*

**ORDER**

Based upon the foregoing Unopposed Motion, the Court hereby:

ORDERS, ADJUDGES AND DECREES that the redacted copy of Plaintiff AAA MAX LIMITED, AAA MAX 2 LIMITED, AAA MAX 3 LIMITED, AAA MAX 4 LIMITED, AAA B787 2 LIMITED and AAA B787 3 LIMITED's Amended Complaint may be filed on the docket. The Court orders the original Amended Complaint be maintained under seal.

IT IS SO ORDERED.

DATED this 11<sup>th</sup> day of March, 2024.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE

Presented By:

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